

**EXHIBIT A**

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

IDEX WIND DOWN, INC. f/k/a  
IDEANOMICS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-12728 (CTG)

(Jointly Administered)

**Re: Docket No. \_\_**

**ORDER (I) ORDER EXTENDING THE DEBTORS' TIME TO FILE NOTICES OF  
REMOVAL OF CLAIMS AND CAUSES OF ACTION RELATED TO THE DEBTORS'  
CHAPTER 11 CASES, AND (II) GRANTING RELATED RELIEF**

Upon the motion (the "Motion")<sup>2</sup> of the above-captioned debtors and debtors in possession (the "Debtors") for entry of an order (this "Order") extending the Removal Deadline by approximately 90 days, through and including August 29, 2025, and due and sufficient notice of the Motion having been given under the circumstances; and it appearing that no other or further notice need be provided under, the circumstances; and it appearing that the relief requested by this Motion is in the best interests of the Debtors, their estates, and their creditors and other parties in interest; and after due deliberation and sufficient cause appearing therefor;

**ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Motion is GRANTED as set forth herein.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number or state identification number are, are: IDEX Wind Down, Inc. f/k/a Ideanomics, Inc. (8374); WAVE Wind Down, LLC f/k/a Wireless Advanced Vehicle Electrification, LLC (6793); Solectrac, Inc. (4653); Timios Holdings Corp. (0190); Justly Holdings Inc. (3657); Justly Markets Wind Down LLC f/k/a Justly Markets LLC f/k/a Delaware Board of Trade Holdings, Inc. (5107); VIA Motors International, Inc. (7063); and VIA Motors, Inc. (0185). The headquarters for the above-captioned Debtors is located at 217 W. 18th Street, PO Box 70, New York, NY 10113.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

2. The period within which notices of removal under Bankruptcy Rule 9027(a)(2) and 9027(a)(3) may be filed is enlarged and extended through and including August 29, 2025 (the “Removal Deadline”).

3. The Removal Deadline applies to all matters specified in Bankruptcy Rule 9027(a)(2) and 9027(a)(3), filed as of the date of this Order.

4. This Order is without prejudice to (a) the Debtors’ or any of their successors’ right to seek further extensions of the Removal Deadline pursuant to Bankruptcy Rule 9027 and (b) any position the Debtors or any of their successors may take regarding whether section 362 of the Bankruptcy Code applies to any Action.

5. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

6. The Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.